

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JAENEAN LIGON, et al.

Plaintiffs,

-versus-

CITY OF NEW YORK, et al.

Defendants.  
-----X

**NOTICE OF PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION**

12 Civ. 2274 (SAS)(HBP)

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, the accompanying Declarations of Christopher Dunn and J. McGregor Smyth, Jr., and evidence adduced at the preliminary injunction hearing held in this matter beginning on October 15, 2012, the plaintiffs will move before The Honorable Shira A. Scheindlin, United States District Judge for the Southern District of New York, for an order certifying the following class pursuant to Federal Rule of Civil Procedure 23(b)(2):

All individuals who have been or are at risk of being stopped outdoors without legal justification by NYPD officers on suspicion of trespassing in Bronx apartment buildings enrolled in the NYPD's Trespass Affidavit Program (commonly referred to as "Operation Clean Halls").

Respectfully submitted,

/s/ Alexis Karteron

Alexis Karteron  
Christopher Dunn  
Taylor Pendergrass  
Daniel Mullkoff  
New York Civil Liberties Union Foundation  
125 Broad Street, 19th Floor  
New York, New York 10004  
(212) 607-3300  
akarteron@nyclu.org

J. McGregor Smyth, Jr.  
Mariana Kovel  
The Bronx Defenders  
860 Courtlandt Avenue  
Bronx, New York 10451  
(718) 838-7878

Juan Cartagena  
Foster Maer  
Roberto Concepcion  
LatinoJustice PRLDEF  
99 Hudson Street, 14th Floor  
New York, New York 10013  
(212) 219-3360

John A. Nathanson  
Tiana Peterson  
Mayer Grashin  
Sarah Lustbader  
Shearman & Sterling LLP  
599 Lexington Avenue  
New York, New York 10022

*Attorneys for Plaintiffs*

Dated: November 9, 2012  
New York, NY